

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

S.T.,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 4:24-CV-00225-WMR
CARSON LOOP ESM, LLC d/b/a)	
BUDGETEL, and SRINIVAS)	
BOLLEPALLI,)	
)	
Defendants.)	

CONSENT MOTION TO EXTEND DISCOVERY

COME NOW, S.T., CARSON LOOP ESM, LLC d/b/a BUDGETEL and SRINIVAS BOLLEPALLI (“the Parties”), and jointly and by consent, respectfully request that discovery in this matter be extended until December 31, 2025, in support of which the Parties show the following:

The Parties have diligently pursued written discovery, written discovery has been exchanged, and depositions are underway. The Parties wish to depose Special Agent Jim Rives, who upon information and belief is a special agent of the Department of Homeland Security, and have been coordinating with the assistant chief counsel in the Office of the Principal Legal Advisor for the Department to secure said deposition. It appearing that this witness is not available for deposition inside the current discovery period ending November 11, 2025, the Parties jointly

and with consent move and request that the discovery period be extended to December 31, 2025, with dispositive motions due to be filed 30 days thereafter.

A proposed Order for the Court's consideration is submitted with this Consent Motion.

This 7th day of November, 2025.

Respectfully submitted,

LAW & MORAN

/s/ Denise D. Hoying

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CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing *Consent Motion to Extend Discovery* has been prepared with one of the following font and point selections approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14 point size.

Respectfully submitted,

LAW & MORAN

/s/ Denise D. Hoying

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CARSON LOOP ESM, LLC d/b/a)	
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BOLLEPALLI,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the foregoing ***Consent Motion to Extend Discovery*** by filing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to:

Sean W. Martin
Stephen A. Swanson
Carr Allison
633 Chestnut St.
Suite 2000
Chattanooga, TN 36450

This 7th day of November, 2025.

Respectfully submitted,

LAW & MORAN

/s/ Denise D. Hoying

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